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December 20, 2019

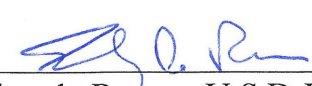
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Via ECF

The Honorable Edgardo Ramos
United States District Judge
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *United States v. Neil Cole*,
19 Cr. 869 (ER)

The January 17, 2020 conference is rescheduled for
January 7 at 11:30 a.m. in Courtroom 14D at 500
Pearl Street.


Edgardo Ramos, U.S.D.J.

Dated: 12/20/2019
New York, New York

Dear Judge Ramos:

MEMO ENDORSED

We represent Neil Cole in the above-reference case. Unfortunately, we have reached an impasse with the government on the proposed trial schedule for this case and are requesting that the Court schedule a conference as soon as possible for the purpose of setting a trial date. We informed the government that, although we prefer a June 2020 trial date, we are prepared to commence trial on the May 11, 2020 date that the Court previously indicated was available in order to accommodate the schedule of certain of the AUSAs on this matter who we understand have a July 7, 2020 trial in another matter. The government has informed us that it is unwilling to consent to a May 11 trial date and has proposed either an earlier date (which we understand is not available) or a date not before

The Honorable Edgardo Ramos

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October. We believe that it is unreasonable to delay the trial of this case (which is based on alleged conduct from 2013 and 2014) until October, and that a May 11 trial date will leave more than adequate time for those members of the government team with a July 7 trial to prepare for that trial. In any event, we regret that we are at an impasse on this issue and request that a conference be scheduled as soon as possible so that an appropriate trial date can be set. We are available to attend a conference in person on December 23, January 3, January 6-10, or January 13-15. Thank you very much for your consideration.

Respectfully yours,

/s/ Lorin L. Reisner
Lorin L. Reisner